

Appendix E – Appraisal Framework Tables

The Appraisal Framework is set out in Chapter 6 of this Environmental Report. The environmental objectives referred to in the tables below are:

- a) Improve efficiency in land use and encourage the prudent use of natural resources.
- b) Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.
- c) Reduce emissions of Greenhouse gases.
- d) Minimise the risk of flooding and resulting detriment to people and property.
- e) Maintain, improve and manage water resources in a sustainable way.
- f) Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats.
- g) Protect and enhance the high quality natural and built environment including landscape and townscape character and particularly the protection of the High Weald AONB.
- h) Reduce waste generation and disposal, and achieve the sustainable management of waste.

The scoring of policies and their alternatives is as follows:

- ++ significant positive effect,
 - + partial positive effect,
 - ? uncertain effect,
 - partial negative effect,
 - significant negative effect,
 - n/a not applicable
-

Vision and Objectives

The vision for the Rye Neighbourhood Plan is ‘a thriving town for the 21st Century’ and the strategic objective is:

“to plan a strategic and coherent development of Rye with the aim of improving the economic and social well-being of the community, considering in particular its role as a market town, a centre for tourism, leisure and culture; its enterprise and its commercial and fishing port, all in the context of its historic maritime character, which should be conserved and its vulnerability to flooding”.

There are 11 detailed Neighbourhood Plan objectives to achieve this vision. The table below appraises these Neighbourhood Plan objectives against the environmental objectives of this Strategic Environmental Assessment to identify any potential environmental impacts.

a) Allocate development land across Rye to meet Core Strategy target for dwellings for Rye (policies H1-H12).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
?	?	?	?	?	?	?	?
Uncertain environmental impacts as it depends on the sites chosen, the type and quality of the development proposed and any mitigation required.							
ii) Ensure all new dwellings are built to high standard (policies D1-D3).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
++	n/a	++	n/a	n/a	n/a	++	n/a
Good design of buildings can ensure good use of land and natural resources; the use of energy efficient and renewable materials, construction measures, fuel systems and green technology; and will result in a high quality built environment.							
iii) Promote effective flood defences to mitigate flood risk, while encouraging an integrated and sustainable drainage system for foul and surface water (policy F1).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
n/a	n/a	n/a	++	++	n/a	n/a	n/a
Will minimise the impacts of flooding by ensuring that flood mitigation schemes are incorporated and encouraging sustainable urban drainage systems (SUDS) within new development; and will manage water resources by reducing hard surfaces to allow permeability of surface waste water.							
iv) Encourage enterprise for employment and business vitality (policies B1-B3).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
?	?	?	?	?	?	?	?
Uncertain environmental impacts as it depends on the sites chosen, the type and quality of the development proposed and any mitigation required.							
v) Improve access and connectivity throughout Rye (policies T1-T3).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
++	+	n/a	n/a	n/a	n/a	n/a	n/a
This will encourage development in places that have good access to essential services by foot, by bicycle and by public transport; this could reduce road congestion and air pollution levels.							
vi) Encourage infrastructure to support a growing community (policies I1-I2).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
+	+	n/a	n/a	n/a	n/a	n/a	n/a
The provision of community infrastructure close to existing and proposed development could support access to essential services by foot, by bicycle and by public transport; this could reduce road congestion and pollution levels.							

vii) Protect green infrastructure of Rye by maintaining the strategic “green” gaps (policy E1).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
n/a	n/a	n/a	n/a	n/a	+	+	n/a
The protection of green gaps would protect existing areas of ecological importance; and maintain existing areas of green open space. This scores only a partial positive on objectives f and g because no enhancement or creation of new open spaces or habitats are proposed.							
viii) Encourage the protection of designated habitats and green spaces (policy E2).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
n/a	n/a	n/a	n/a	n/a	+	+	n/a
The protection of designated habitats and green spaces would protect existing areas of ecological importance; and maintain existing areas of green open space. This scores only a partial positive on objectives f and g because no enhancement or creation of new open spaces or habitats are proposed.							
ix) Encourage the protection of the historic environment (Policy E3).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
n/a	n/a	n/a	n/a	n/a	+	++	n/a
Will designate heritage assets and set control policies to conserve and enhance this part of the environment.							
x) Encourage initiatives for efficient use of energy and water through building design (policy E4).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
n/a	n/a	++	n/a	++	n/a	n/a	+
Will promote energy efficiency in new development, greater energy uses from renewable resources and the use of clean technologies. It will encourage reduction in amount of hard surfaces to allow permeability of surface water. It could also encourage recycling of waste by provision of facilities to store and collect waste.							
xi) Avoid inappropriate development in areas of current or future risk of landslip by directing development away from areas of highest risk (policy E5).							
SEA a)	SEA b)	SEA c)	SEA d)	SEA e)	SEA f)	SEA g)	SEA h)
n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
No relevant environmental objective.							

The above table demonstrates that most of the Neighbourhood Plan objectives have either neutral or positive environmental potential impacts. The only exceptions to this are Plan objective i) Allocate development land across Rye to meet Core Strategy target for dwellings for Rye (policies H1-H12) and Plan objective iv) Encourage enterprise for employment and business vitality (policies B1-B3). These Plan objectives have uncertain environmental impacts because they depend on the

sites chosen, the type and quality of the development proposed and any mitigation required.

To establish these potential environmental impacts the strategic approach to the distribution of growth; each of the proposed allocations; and the alternatives considered have themselves been appraised against the environmental objectives in this Strategic Environmental Assessment.

Location of Residential Development (Policies H1-H8)

Residential: Strategic Approach

The Rother DC Core Strategy requires between 355-400 dwellings net additional dwellings between 2011 and 2028 and states that opportunities for growth will primarily be sought within the built up area of Rye. The recently published Development and Site Allocations document states that there have been 198 completions since 2011; 28 commitments (i.e. dwellings with planning permission but not yet built); and it is anticipated that 22 further residential units will be delivered through windfall development. This leaves a residual requirement of 107 units to be delivered in Rye and Rye Harbour.

A number of different options were discussed for distributing this growth:

Option A: development dispersed across sites within and adjacent to Rye.

Option B: development concentrated in one location.

Option C: to have no Neighbourhood Plan policies on the distribution of growth but to leave this to Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	++	n/a	n/a	n/a	++	++	n/a
Option B	--	--	n/a	n/a	n/a	-	-	n/a
Option C	?	?	n/a	n/a	n/a	?	?	n/a

Option A would distribute development across several sites within Rye. This would encourage development in accessible locations which would reduce potential traffic congestion and make good use of brownfield land. It is likely to use less greenfield land than option B, resulting in better biodiversity and landscape impact scores. Option B would allocate all residential development to one site, which would require the identification of a significant green field site outside of the existing built up area of Rye. This option is likely to lead to more car journeys into the town centre and potentially higher biodiversity and landscape effects. Option C would mean that the Neighbourhood Plan did not allocate any sites but left this to Rother District Council, probably as part of the Development and Site Allocations document. The environmental effect is unknown as RDC locational strategy if it was allocating sites might be option A or B or a combination of both. Objectives c, d, e, and h cannot be assessed without knowing specific sites.

Conclusion: Option A has the most positive environmental effects.

Residential: Site Appraisals

To identify potential sites for residential development the following methods were used:

- A review of the Rother District Council Strategic Housing Land Availability Assessment (SHLAA);
- A review of other potential sites put forward during the Neighbourhood Plan process;
- A Map survey to consider any sites not previously considered.
- Consultation with owners and other key interested parties.

The potential residential sites are listed in the tables below. Note that objectives c, e and h are all marked 'not applicable' because the environmental effect can only be determined at detailed design stage.

Ry41 Valley Park: Policy H2 proposes additional 5 dwellings adjacent to allocated site under construction							
Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
+	+	n/a	-	n/a	-	+	n/a
<p>Whilst this site is on the edge of town, the location and landscape impact of the site under construction were considered acceptable by the Planning Inspector who approved it. A small extension to the development is likely to have limited environmental impact although it will remove some of the greenspace around the existing development. To protect the profile of the Udimore Road gateway into Rye, any additional development will be confined to the lower (eastern) part of the site within the settlement boundary and must be matched by additional measures to mitigate the flood risks.</p> <p>Conclusion: environmental impacts mainly partially positive with a partial negative for d due to need to mitigate flood risk and for objective f due to loss of green space.</p>							

Ry18 Tilling Green School: Policy H3 proposes 30 dwellings							
Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
++	++	n/a	-	n/a	-	+	n/a
<p>Sustainable site close to existing shops and services and has no landscape constraints. Access can be delivered off a number of points along the frontage. The former school site is well used by the local community and local stakeholders have indicated there should be some retention of community use onsite as part of any proposal. RY18 will be subject to both the sequential and exception test given its location in the flood zone and there is a requirement for further investigation of surface water flooding and drainage issues.</p> <p>Conclusion: partially brownfield location close to town centre means that this site scores well on the first two objectives and has a partial positive for objective g due to its lack of landscape constraints. However, it scores partial negatives for objectives d and f due to flood risk and loss of green space.</p>							

Ry3 Rock Channel: Policy H4 allocates for 35 dwellings							
Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
++	++	n/a	-	n/a	+	++	n/a

Land between South Undercliff and Rock Channel Rye as defined in the adopted Local Plan, is currently allocated for housing, open space and appropriate commercial uses. The site is made up of several commercial businesses and a wharf. A comprehensive approach to development in this area is required in order to ensure the most effective and efficient use of land and that individual elements contribute to a holistic vision, which also looks to strengthen links with adjacent areas, notably the town centre. The area is allocated for housing, open space, appropriate commercial uses and offices, falling within the A2 and B1 use classes, which should be at a scale appropriate to this mixed-use site close to the town centre.

Conclusion: brownfield location close to town centre means that this site scores well on the first two objectives and objective g due to the potential to enhance the currently poor built environment. It has a partial positive for objective g due to the site's lack of greenspace currently and the opportunity to enhance this. However, it scores a partial negative for objective d due to flood risk.

Ry 36 Land East of Gateborough Farm, Winchelsea Rd East: Policy H5 allocates for 10 dwellings

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
++	++	n/a	-	n/a	+	++	n/a

Some employment would be retained on site and development would be restricted to the brownfield element of the RY36. There is indication of surface water flood risk onsite and the whole of the site falls within Flood Risk Zone 2 & 3 with the sequential and exception test applicable. Development of housing would be restricted to areas where no risk of surface water flooding occurs.

Conclusion: brownfield location close to town centre means that this site scores well on the first two objectives and objective g due to the potential to enhance the currently poor built environment. It has a partial positive for objective g due to the site's lack of greenspace currently and the opportunity to enhance this. However, it scores a partial negative for objective d due to flood risk.

Ry53 Winchelsea Rd West: Policy H6 allocates for 20 dwellings

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
++	++	n/a	-	n/a	+	++	n/a

Issues with contamination on parts of the site would require assessment as part of any application. The site is located in Flood Zone 2 & 3 and would have to undertake both the sequential and exception test as part of the process. There is an opportunity to undertake a comprehensive design led redevelopment of this particular location with a mixed use development which is sensitive to one of the gateways into the town as well as views of the nearby historic core of Rye. There are opportunities for residential dwellings as well as improved local linkages between this area and the town, commercial and some appropriate community facilities on the site.

Conclusion: brownfield location close to town centre means that this site scores well on the first two objectives and objective g due to the potential to enhance the currently poor built environment. It has a partial positive for objective g due to the site's lack of greenspace currently and the opportunity to enhance this. However, it

scores a partial negative for objective d due to flood risk.

Ry19a Freda Gardham School: Policy H7 allocates for 30 dwellings

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
++	++	n/a	--	n/a	-	+	n/a
<p>Ry19a is a flat brownfield site which comprises a former school and the agricultural backland. The site is relatively well connected with pedestrian footpaths and public transport links all close by. The site is at high risk and is poorly defended from tidal flooding and would be subject to Sequential Test and Exception Test. Development is dependent on completion of flood risk mitigation by the Environment Agency's Easter Rother Tidal Flood Walls project planned for 2018/19. Suitable for development, possibly as part of a mixed use scheme." How foul water is disposed to ground in the area is important due to the shallow groundwater and very limited attenuation that would occur in the unsaturated zone above the water table.</p> <p>Conclusion: partially brownfield location close to town centre means that this site scores well on the first two objectives. It has a partial positive for objective g due to the opportunity to enhance the built environment by removal of some unsightly ancillary buildings. However, it scores a partial negative for objective f due to loss of green space and a significant negative effect for flood risk.</p>							

Lower School Site: Policy H8 has a reserve allocation for 50 dwellings

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
++	++	n/a	-	n/a	-	+	n/a
<p>The site has potential for four uses: housing, supermarket or commercial, education or other such as parking. The site is being sold with planning permission for a supermarket. There is a related S106 that aims to improve the nearby rail crossing and the area known as station approach. Given the proximity to sewers and surface water drains the site will require localised flood risk mitigation.</p> <p>Conclusion: partially brownfield location close to town centre means that this site scores well on the first two objectives. It has a partial positive for objective g due to the opportunity to enhance the built environment by removal of some unsightly ancillary buildings. However, it scores a partial negative for objective f due to loss of green space and a partial negative effect for flood risk.</p>							

Ry7 Former Council Depot, Cyprus Place: Alternative Site Considered

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
++	++	n/a	-	n/a	+	+	n/a
<p>Within flood zone and therefore development would be subject to sequential and exception test. There is an opportunity to improve character of site to fit better with character of surrounding residential properties in an area which is predominantly residential. Could accommodate 7 dwellings with some small retail/commercial opportunity more in keeping with the locality. Currently unavailable due to existing commercial use.</p> <p>Conclusion: brownfield location close to town centre means that this site scores well on the first two objectives. It has a partial positive for objectives f and g due to</p>							

the opportunity to enhance the built and natural environment but a partial negative for objective d due to flood risk.

Ry 12 Land North of Gateborough Farm: Alternative Site Considered

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
-	-	n/a	-	n/a	--	--	n/a
<p>Outside the settlement boundary and within the AONB. The site is also with Flood Risk Zone 2 & 3 and the area is identified Coastal and Floodplain grazing marsh (BAP Habitat). The impact on the wider landscape as well as important views would be unacceptable given the character and setting of the town especially the citadel.</p> <p>Conclusion: significant negative effect on biodiversity and landscape impact given AONB location and partial negative effects on accessibility and traffic congestion due to distance from town centre. Partial negative on flood risk.</p>							

RY17 Land West of Oast House Drive: Alternative Site Considered

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
-	-	n/a	+	n/a	-	--	n/a
<p>RY17 is located outside the settlement boundary. Part of the site extends into the AONB and development of RY17 would extend ribbon development into the wider countryside. RY17 is also relatively distant from local services.</p> <p>Conclusion: significant negative effect on landscape impact given AONB location and partial negative effects on accessibility and traffic congestion due to distance from town centre. Partial negative on objective f due to loss of greenfield site but partial positive on flood risk as site does not appear to be in flood zone 2 or 3.</p>							

RY21 Land r/o Love Lane: Alternative Site Considered

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
-	-	n/a	-	n/a	-	-	n/a
<p>RY21 is a greenfield site is located outside the settlement boundary and within Flood Zone 2&3.</p> <p>Conclusion: partial negative effects on first two objectives due to distance from the town centre, partial negative effect on flood risk and partial negative effect on objectives f and g due to loss of greenfield site and landscape impact.</p>							

RY22 Land East of Tilling Green Estate: Alternative Site Considered

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
-	-	n/a	-	n/a	-	--	n/a
<p>RY22 is located outside the existing settlement boundary and within the AONB. RY22 is</p>							

also sited within Flood Risk Zones 2 & 3 and there are issues with drainage and surface water flooding.

Conclusion: significant negative effect on landscape impact given AONB location and partial negative effects on accessibility and traffic congestion due to distance from town centre. Partial negative on objective f due to loss of greenfield site and on objective d due to flood risk.

RY23 Land South of Rock Channel: Alternative Site Considered

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
+	+	n/a	-	n/a	-	--	n/a

RY23 is outside the settlement boundary and within the AONB and is set within flood plain. RY23 is also an important visual strategic gap between Rye and Rye Harbour Village. The Inspector at the Local Plan Inquiry stipulated development at RY23 should be resisted given the negative impact on the setting of the Citadel.

Conclusion: significant negative effect on objective g given AONB and strategic gap location and impact on views of the Citadel. Partial positive effects on accessibility and traffic congestion due to proximity to town centre. Partial negative on objective f due to loss of greenfield site and on objective d due to flood risk.

RY26 Land at Glenclose Farm, West Undercliff: Alternative Site Considered

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
-	-	n/a	-	n/a	-	-	n/a

RY26 is outside the settlement boundary but well screened visually from the wider locality. There are access constraints attached to the site making delivery very difficult. The greenfield site is sited within Flood Risk Zone 2 & 3.

Conclusion: partial negative effects on first two objectives due to distance from the town centre, partial negative effect on flood risk and partial negative effect on objectives f and g due to loss of greenfield site and natural environment.

RY27 Land adj. to 136 New Winchelsea Road: Alternative Site Considered

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
-	-	n/a	-	n/a	-	-	n/a

RY27 abuts existing residential development but is sited outside the settlement boundary contrary to Policy OSS3. The site is far from existing services making it unsustainable in comparison with sites available closer to the centre of the town. The greenfield site is located within Flood Risk Zones 2 & 3. RY27 would extend ribbon development and is relatively remote from the main built up area of the town.

Conclusion: partial negative effects on first two objectives due to distance from the town centre, partial negative effect on flood risk and partial negative effect on objectives f and g due to loss of greenfield site and landscape impact.

RY29 Land south of Guldeford Road: Alternative Site Considered

Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
-	-	n/a	-	n/a	--	--	n/a
<p>RY29 is outside the settlement boundary and extends out into the wider AONB countryside. RY29 is adjacent to a SSSI, Flood Risk Zones 2 & 3 and the area has been identified by UK Biodiversity Action Plan as a Coastal and Floodplain Grazing Marsh. Development of RY29 would have a negative impact on the wider landscape.</p> <p>Conclusion: significant negative effect on biodiversity and landscape impact given AONB location and partial negative effects on accessibility and traffic congestion due to distance from town centre. Partial negative on flood risk.</p>							

RY38 Land south of Thomas Peacock School: Alternative Site Considered							
Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
-	-	n/a	-	n/a	-	-	n/a
<p>Greenfield site on Flood Risk Zone 3 and issues with drainage.</p> <p>Conclusion: partial negative effects on first two objectives due to distance from the town centre, partial negative effect on flood risk and partial negative effect on objectives f and g due to loss of greenfield site and landscape impact.</p>							

RY39 Land South West of Rye: Alternative Site Considered							
Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
-	-	n/a	-	n/a	--	--	n/a
<p>Significant greenfield parcel located outside the settlement boundary and set within the AONB. Other significant constraints attached to RY39 include its location within Flood Risk Zone 2 & 3, its close proximity to an ancient monument and the whole area has been identified as Coastal Floodplain and Grazing Marsh under the UK BAP habitat schedule. The site extends out into the wider landscape and provides important visual setting as you enter Rye from the southwest.</p> <p>Conclusion: significant negative effect on biodiversity and built and natural environment given BAP status, AONB location and impact on ancient monument. Partial negative effects on accessibility and traffic congestion due to distance from town centre. Partial negative on flood risk.</p>							

RY42 Land north of Thomas Peacock School: Alternative Site Considered							
Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
-	-	n/a	-	n/a	-	-	n/a
<p>Greenfield site within Flood Risk Zone 3. There are further constraints attached to issues of appropriate and safe access and the impact on the local road network.</p> <p>Conclusion: partial negative effects on first two objectives due to distance from the town centre and access problems, partial negative effect on flood risk and partial negative effect on objectives f and g due to loss of greenfield site and landscape impact.</p>							

H9: Provide Appropriate mix of Dwellings:

Option A: To have a policy that sets minimum percentages for small homes and those for the elderly and requires affordable housing to be allocated to people with local connections to Rye.

Option B: To have a policy that sets percentages for all home sizes and requires affordable housing to be allocated to people with local connections to Rye.

Option C: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Option B	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Option C	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

This subject area relates to social aims and the proposed policy and its alternatives have no environmental impacts.

Conclusion: No difference between the options from an environmental perspective.

H10: Windfall sites across Rye

Option A: To have a policy that supports windfall development of up to 5 dwellings within the settlement boundary subject to criteria.

Option B: To have a policy that supports windfall development of any scale within the settlement boundary subject to criteria.

Option C: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	+	+	n/a	n/a	n/a	n/a	+	n/a
Option B	++	-	n/a	n/a	n/a	n/a	-	n/a
Option C	++	-	n/a	n/a	n/a	n/a	-	n/a

A windfall policy within settlement boundaries will encourage development in places that have good access to essential services by foot, by bicycle and by public transport; and will result in a more efficient use of brownfield sites. This positive effect will be reduced if a cap is placed on the number to be delivered. On traffic congestion, limited windfall development may have a positive effect because the development is likely to be in locations accessible on foot, but large scale unplanned development could cause localised congestion. Protection and enhancement of the high quality natural and built environment is more likely with small scale windfall development that with larger scale unplanned development. Option c would result in existing Local Plan policies being applied to windfall development which would have a similar impact to option b. The other objectives would not be affected by this subject area.

Conclusion: overall option a) has more positive impacts than options b) and c).

H11: Self build or Custom Build development

This policy has been amalgamated into policy H7.

H12: Development related Infrastructure

Option A: To have a policy that requires developer contributions towards infrastructure in priorities set by Rye Town Council and included in the Rother District Council Infrastructure Development Plan, with particular priority given to traffic related projects.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	+	++	n/a	+	n/a	+	n/a	+
Option B	?	+	n/a	?	n/a	?	n/a	?

The provision of infrastructure, particularly traffic related schemes, could reduce road congestion and pollution levels. It is likely that expenditure of developer contributions on infrastructure in Rye would still happen if there was no neighbourhood plan policy on this subject but it may be less targeted to local priorities. Similar justification is used for the difference in scoring the provision of community infrastructure and green infrastructure close to development and flood prevention measures against objectives a, d, f and h but the scoring is lower because it is less likely that these will be prioritised given the need for and cost of transport infrastructure.

Conclusion: overall option a) has more positive impacts than option b).

D1: Design Principles

Option A: To have a policy which requires that all development will conform to the following design principles: 1 - Achieving High Quality Design; 2 - Planned, Selective Redevelopment; 3 - A Vibrant Mix of Land Use; 4 – Making the best use of the Rural Margins and Riverfronts; 5 – Ensuring and Improving Accessibility; 6 - Managing Flood Risk; 7 - Providing Affordable Housing; 8 - Respecting and Recording Archaeology; 9 - Maintaining Quality into the Future; and 10 – Flexibility and Innovation.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	++	++	++	++	?	++	?
Option B	+	+	+	+	+	+	+	?

Principle 2 would encourage the redevelopment of brownfield land through its allocation whereas national policy only has generalised support for the use of brownfield land. Principle 5 encourages improved accessibility whereas national policy only requires that severe harm to road congestion should be avoided. Principle 9 encourages energy efficiency and sustainability, Principle 6 requires the management of flood risk and water runoff. Whilst none of the principles mention biodiversity or greenspaces, some of the other measures such as improving pedestrian connectivity, flood management and best use of rural margins and riverfronts may have positive impacts on green infrastructure.

Conclusion: overall option a) has more positive impacts than option b) because, whilst all these principles are supported by national policy, they will have more strength by specific mention in the neighbourhood plan.

D2: The Character of Rye

Option A: To have a policy that requires all new development to complement or enhance the existing character of Rye, so that it reflects the existing proportion, height, scale, materials of the built environment.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	n/a	n/a	n/a	n/a	n/a	n/a	++	n/a
Option B	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a

Only objective g is relevant to this policy. Whilst this policy requirement is supported by local and national policy, it will have more strength by specific mention in the neighbourhood plan.

Conclusion: option a) has more positive impacts than option b).

D3: Design Guidance

Option A: To have a policy that requires developers to indicate that they have complied with the guidance in:

- a. Secured by design
- b. Building for Life 12
- c. Streets for All: Southeast

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies and guidance.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	n/a	n/a	n/a	n/a	n/a	n/a	++	n/a
Option B	n/a	n/a	n/a	n/a	n/a	n/a	++	n/a

Only objective g is relevant to this policy. As this policy simply cross-refers to existing local and national guidance its inclusion will have no additional environmental benefits.

Conclusion: no difference between the options.

F1: Plan to mitigate Flood Risks

Option A: To have a policy that requires development to be designed and constructed to minimise flood risk and adverse impact on watercourses and utilise Sustainable Urban Drainage Systems or retention measures and permeable driveways, water harvesting or green roofs.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	n/a	n/a	n/a	++	++	n/a	n/a	n/a
Option B	n/a	n/a	n/a	++	++	n/a	n/a	n/a

Both options would minimise the impacts of flooding by ensuring that flood mitigation schemes are incorporated and sustainable urban drainage systems (SUDS) and other measures such as permeable surfaces are incorporated.

Conclusion: little difference between the options.

B1: Supporting Business and Enterprise

Option A: To have a policy that supports existing business and enterprise, home working and the provision of improved broadband connections; including the enhancement of the core business area in central Rye by encouraging the retention of the former cattle market as a site for a traditional market and parking; resisting the loss of business floor space where this requires planning permission; supporting the information centre as part of the Rye

Heritage Centre; and supporting any development which regenerates or enhances the fishing and maritime and port related industries.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	++	n/a	n/a	n/a	n/a	+	n/a
Option B	+	+	n/a	n/a	n/a	n/a	+	n/a

Option A would encourage the continued use and redevelopment of town centre brownfield sites, and good off-road parking provision would reduce traffic congestion. Option A also has potential to improve the built environment by supporting the cultural heritage of Rye.
Conclusion: option a) has more positive impacts than option b).

B2: Enhancement of business opportunities

Option A: To have a policy that encourages additional business development of micro (low footfall) businesses around the Citadel in Zone B; supports new business development especially small scale flexible office units, affordable workshops and high quality office space will be approved in appropriate locations; encourages improved broadband access for businesses and home workers; and encourages those enterprises which exploit “green tourism” such as walking and cycling adventures.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	++	n/a	n/a	n/a	n/a	+	n/a
Option B	+	+	n/a	n/a	n/a	n/a	+	n/a

Option A would encourage additional business use of town centre brownfield sites, and good broadband and encouragement of walking and cycling would reduce traffic congestion. Option A also has potential to improve the built environment by the provision of high quality business space.
Conclusion: option a) has more positive impacts than option b).

B3: Retail Allocation

Option A: To have a policy that allocates a primary site for a second supermarket as site S1 with reserve sites as S2 and S3; and supports expansion at Site S4 subject to traffic measures.

Option B: To allocate site S2 as the primary supermarket site.

Option C: To allocate site S3 as the primary supermarket site.

Option D: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	++	n/a	-	n/a	-	+	n/a
Option B	++	++	n/a	-	n/a	-	+	n/a
Option C	++	++	n/a	--	n/a	-	+	n/a
Option D	-	-	n/a	?	n/a	?	?	n/a

All three sites for the supermarket are ‘edge of centre’ as there are no town centre sites large enough for the Core Strategy retail floorspace requirement of 1650 sq m. There is

little difference between the options in environmental terms, as they all utilise partly brownfield sites within the town, scoring well on the first two objectives, but also require the loss of green areas and have some flood risk issues. Having no neighbourhood plan policy on this subject could result in all of these potential sites being lost to alternative uses and any proposed supermarket being pushed out to edge of or out of town locations which would score badly on the first two objectives and have uncertain impacts on objectives d, f and g.

Conclusion: Little difference in environmental terms between the first three options, but all score better than Option D.

T1: Pedestrian Access

Option A: To have a policy which ensures that developments provide safe pedestrian access to link up with existing or proposed footpaths, ensuring that residents can walk safely to town facilities.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	++	n/a	n/a	n/a	n/a	n/a	n/a
Option B	+	+	n/a	n/a	n/a	n/a	n/a	n/a

Option A encourages development in places that have good access to essential services by foot which supports walking and reduces traffic congestion. Option B would also do this to some extent but the inclusion of a specific Neighbourhood Plan policy would emphasise its importance for Rye.

Conclusion: option a) has more positive impacts than option b).

T2: Cycleway Improvements

Option A: To have a policy that encourages cycle way improvements – to include the Greenway initiative – for better connectivity with facilities for secure cycle parking.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	++	n/a	n/a	n/a	n/a	n/a	n/a
Option B	+	+	n/a	n/a	n/a	n/a	n/a	n/a

Option A encourages development in places that have good access to essential services by cycle which supports cycling and reduces traffic congestion. Option B would also do this to some extent but the inclusion of a specific Neighbourhood Plan policy would emphasise its importance for Rye, particularly with the support for the specific Greenway initiative.

Conclusion: option a) has more positive impacts than option b).

T3: Parking Standards

Option A: To have a policy that requires that new dwellings with 2, 3 or 4 bedrooms will be provided with a minimum of 2 off-street car-parking spaces per dwelling and that new dwellings with more than 4 bedrooms shall be provided with a minimum of 3 off-street car-parking spaces.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	n/a	+	n/a	n/a	n/a	n/a	?	n/a
Option B	n/a	?	n/a	n/a	n/a	n/a	+	n/a

Option A seeks to specify parking standards so that on street parking does not add to the traffic congestion through Rye, and therefore scores well on objective b. However, such an inflexible approach may be detrimental to the built environment by making designs too car dominated. Option B would rely on Core Strategy policy TR4 which is more flexible to local situations such as providing a lower standard where there is a high level of accessibility by other means of transport. This scores better on objective g but leaves some uncertainty about impact on traffic congestion.

Conclusion: Overall little difference between the two options.

I1: Retention of community facilities in the West of Rye

Option A: To have a policy that supports the retention of community facilities in the west of Rye.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	++	n/a	n/a	n/a	n/a	n/a	n/a
Option B	+	+	n/a	n/a	n/a	n/a	n/a	n/a

Option A seeks to retain community facilities in the west of Rye because of the disposal of the former Tilling Green School. The policy wording would allow for existing facilities to be re-provided on this site or elsewhere on this side of Rye. Retention of community facilities in this area scores well on the first two objectives due to accessibility of the facilities to the community reducing the need for travel by car. National and local plan policies also protect existing community facilities, but a specific mention in the neighbourhood plan gives this requirement extra strength.

Conclusion: option a) has more positive impacts than option b).

I2: Protection of Existing Community Facilities

Option A: To have a policy that protects Community Centres; Early Years facilities, Rye Leisure Centre; Salts sports fields; Rye Bowls Club; and Rye Rugby Club; unless their removal is justified by replacement, lack of need or viability.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	+	n/a	n/a	n/a	n/a	n/a	n/a
Option B	+	+	n/a	n/a	n/a	n/a	n/a	n/a

Both options score well on the first two objectives because the retention of community facilities means that they are accessible to users and generally can be reached without the need for car use. Option A scores slightly better than Option B because, whilst national and local policies already protect community facilities, naming specific facilities of value to the community in Rye gives this protection additional strength.

Conclusion: option a) has more positive impacts than option b).

E1: The Settlement Boundary and Strategic Gaps

Option A: to have a policy that defines a settlement boundary within which the principle of development will be acceptable and identifies strategic green gaps between Rye and adjacent settlements where development will only be supported if it conserves and enhances the open landscape character of the gap, and does not reduce the physical gap between settlements.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	++	n/a	n/a	n/a	++	++	n/a
Option B	++	++	n/a	n/a	n/a	++	++	n/a
<p>Having a development boundary and strategic gaps scores well on keeping development compact and accessible, maximising use of brownfield land and minimising use of greenfield land which is likely to have greater biodiversity and landscape impacts. However, there is little difference between the two options. Core Strategy Policy OSS2 sets out the purpose of development boundaries around settlements as continuing to differentiate between areas where most forms of new development would be acceptable and where they would not. Core Strategy Policy RY1 protects the Rye-Rye Harbour strategic gap and the DaSA proposes to extend it slightly along the riverside. Having a Neighbourhood Plan policy enables the development boundary to be reviewed and updated but otherwise has no environmental effects.</p> <p>Conclusion: Little difference between the options.</p>								

E2: To protect and enhance green infrastructure.

Option A: To have a policy that protects specified open spaces and encourages new tree planting and the use of green infrastructure to improve connectivity to existing roads, ways and paths.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	++	n/a	++	++	++	++	n/a
Option B	+	+	n/a	+	+	+	+	n/a
<p>Option A scores well on the first two objectives because green routes improve accessibility on foot and by cycle and reduces car use and pollution. They also have a significantly positive impact on Biodiversity and natural environment objectives. Green infrastructure can also help to mitigate flood risk and reduce surface water runoff. National and Local Plan policies can protect existing green infrastructure but may not result in enhancement locally so score lower.</p> <p>Conclusion: Both options have positive impacts but Option A performs best.</p>								

E3: To promote conservation of the historic environment

Option A: To have a policy that sets development control policies to conserve Rye's heritage specifically to: protect, through work with partners, Rye's public heritage structures: including the Landgate Tower, remains of the Town Walls to the North of

the Centre, the Town War Memorial and the lookouts in the west and east of the Citadel. To encourage the movement of the Rother Barge “Primrose” from Hastings to Rye to a location to be decided on the Strand.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	++	n/a	n/a	n/a	n/a	++	++	n/a
Option B	++	n/a	n/a	n/a	n/a	+	+	n/a
Conclusion: Option A performs best.								

E4: To encourage measures to reduce energy consumption

Option A: To have a policy that encourages measures to reduce energy consumption such as smart metres; the fitting of solar panel systems; off-peak energy storage systems; individual and community scale energy generation systems; and demand response systems.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	n/a	n/a	++	n/a	n/a	n/a	?	+
Option B	n/a	n/a	+	n/a	n/a	n/a	?	+
Both options encourage energy efficiency in design and may also encourage more recycling which in itself saves energy. The specific reference to measures within Option A may strengthen the existing policy requirements and lead to a more significant positive effect on objective c. There is some uncertainty for both options under the quality of the built and natural environment because some measures may be unsightly.								
Conclusion: Option A performs better than Option B.								

E5: Unstable Land

Option A: To have a policy which only permits development on or below unstable or potentially unstable land where the nature of the instability has been properly assessed; and any remedial measures required to ensure that the development does not add to the instability of the site or surrounding land; are environmentally acceptable; and normally implemented prior to the commencement of building works.

Option B: To have no Neighbourhood Plan policy on this subject but to rely on national and Local Plan policies.

Policy Options	Obj a	Obj b	Obj c	Obj d	Obj e	Obj f	Obj g	Obj h
Option A	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Option B	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Conclusion: No impact on any of the environmental objectives.								